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Comments of
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before
President's Food Safety Council
Dallas, Texas
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Good morning. My name is Rosemary Mucklow. I am the Executive Director of National Meat Association, headquartered in Oakland, California and representing the interests of over 600 members, over half of whom have a grant of inspection pursuant to the Federal Meat Inspection Act and the Processed Products Inspection Act. I am also a member of the Secretary of Agriculture's Meat & Poultry Inspection Advisory committee, and have served several previous terms as a member of this committee. Perhaps most importantly, I have personally served industry organizations for nearly forty years, and am personally familiar with the public policy over this time that brings us to today, the last month of the second last year of the 1990s. Sometimes it feels as though Domesday is approaching, so much is scheduled for 2000!

Much has happened in this decade to make meat in particular, and food in general, more safe than it has ever been before for Americans. We may boast that food is safer in the U.S. than anywhere else in the world, and I happen to believe that this is true. It's true most likely because, despite many bumps in the road, both the government overseers and the food companies share a common interest in making food safe -- it builds repeat customers!

If the United States of America were starting from scratch today to build a government program of oversight for food safety, there is no doubt in my mind that it would make sense to have one supreme agency with the responsibility for this goal. A Food Safety Czar or Czarina, if you will, because I'm not about to concede on the sex of the individual. However, the complicated path of regulatory oversight has designed us a very

complicated web that looks more like a magnification of the jumble of wires that make my computer, copier, telephone, FAX, Internet and whatever all work in sync at my desk.. It's very difficult, in fact it would be impossible, to unravel the web that we have created over many, many years.

The mode in Washington these days is to decrease the size, and hopefully the influence that the federal government has, and to make the federal programs more stream-lined and efficient. An admirable goal. I've seen the National Academy of Sciences report, and the GAO Report that make suggestions how this can happen at least in the regulatory oversight of the meat and poultry industry. Many valid points were included, and suggest thoughtful investigation. However, I'm here to tell you that at the moment, it is my opinion that both the regulatory program and the meat and poultry industry need to complete the implementation of HACCP in the most orderly way possible. No more change should even be contemplated until this is done, and evaluated, and I would suggest to you that this won't be completed until at least the end of the calendar year 2000.

Currently, we've implemented this sea-change program only in the largest, most sophisticated plants in the industry -- just over 300 of them. In January, the next wave will implement. We think it's somewhere between 3000 and 4000 plants. And the rest come a year later. We then have to reconcile a long-festering issue -- the state plants that are required to meet "equal to" the federal standards, but don't receive "equal to" rights under the law.

Those of us familiar with the meat industry know that there have been many changes in this decade. We're struggling with huge disparities in application. We think that the federal agencies could do a lot more under their existing authorities to streamline the system and work together better. The USDA has just caused grievous harm to a fine company manufacturing ground beef by requiring them to recall product and, **after** the fact, no one can find that there was anything wrong with it. The federal government can't replicate the finding by the state laboratory, a finding done by a different analytical method, and that was not communicated as a presumptive finding to the affected company, which is a requirement of the federal program procedures. There's a lot that the agencies, federal, state and local could do to interact and integrate with each other short of making them all one big conglomerate agency.

Finally, my politics may show here, but I feel compelled to say it for the record. A centralized bureaucracy doesn't make food safer! A food industry that knows and understands its responsibility for producing safe food, at the locations in the real world where that food is produced and delivered to the consumer, bearing the company's name and address so that a consumer has recourse, is what makes food safe. It's called commitment to integrity and safety.

Thank you for your time and attention. I'd be pleased to respond to your questions.